

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

-----x
In re: :
: Chapter 13
WILLIAM A. BROWNLEE, SR, :
: Case No. 24-10598 (PMM)
Debtor. :
-----x

ENTRY OF APPEARANCE OF THE CITY OF PHILADELPHIA
COMBINED WITH DEMAND FOR SERVICE OF PAPERS

TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly enter the appearance of MEGAN N. HARPER, Divisional Deputy City
Solicitor as counsel of record for creditor The City of Philadelphia and/or Water Revenue
Bureau, where applicable, in the above-captioned matter.

PLEASE TAKE NOTICE that the City of Philadelphia and/or Water Revenue
Bureau, (the "City"), a creditor and party-in-interest in the above-captioned case, hereby
appears in the above-captioned case by its counsel, Megan N. Harper, Divisional Deputy
City Solicitor; such counsel hereby enters their appearance pursuant to Title 11 of the
United States Code, 11 U.S.C. § 101 *et seq.* (the "Bankruptcy Code") and Fed. R. Bankr.
P. 9010 (b), and such counsel hereby requests, pursuant to Fed. R. Bankr. P. 2002, 3017,
9007 and § 342 of the Bankruptcy Code, that copies of all notices and pleadings given or
filed in the captioned case and served upon the City and to the attorney at the address and
telephone number set forth below.

This Notice of Appearance and Demand for Notices and Papers shall not be
deemed or construed to be a waiver of Creditor's rights: (1) to have final orders in
noncore matters entered only after *de novo* review by a District Judge; (2) to trial by jury

in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which Creditor is or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments Creditor expressly reserves.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: October 1, 2024

By: /s/ Megan N. Harper
MEGAN N. HARPER
Divisional Deputy City Solicitor
PA Attorney I.D. 81669
Attorney for the City of Philadelphia
City of Philadelphia Law Department
Municipal Services Building
1401 JFK Boulevard, 5th Floor
Philadelphia, PA 19102-1595
215-686-0503 (phone)
Email: Megan.Harper@phila.gov

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Entry of Appearance of the City of Philadelphia was served by the means designated below, on the date set forth below, upon the following parties:

Via ECF Filing:

Debtor's Counsel
MICHAEL A. CIBIK
Cibik Law, P.C.
1500 Walnut Street –Suite 900
Philadelphia, PA 19102

Chapter 13 Trustee:

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street, Suite 1813
Philadelphia, PA 19107

Via USPS Mail Delivery:

William A. Brownlee, Sr.
640 N 39th Street
Philadelphia, PA 19104-1853

THE CITY OF PHILADELPHIA

Dated: October 1, 2024

By: /s/ Megan N. Harper
MEGAN N. HARPER
Divisional Deputy City Solicitor
PA Attorney I.D. 81669
Attorney for the City of Philadelphia
City of Philadelphia Law Department
Municipal Services Building
1401 JFK Boulevard, 5th Floor
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